

IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

**DESHANTA BREWSTER, Individually and on
Behalf of All Others Similarly Situated**

PLAINTIFF

vs.

No. 2:22-cv-12220-MFL-DRG

MISSION POINT MANAGEMENT SERVICES, LLC

DEFENDANT

JOINT MOTION FOR APPROVAL OF COLLECTIVE ACTION SETTLEMENT

COME NOW Named Plaintiff Deshanta Brewster, individually and on behalf of all others similarly situated (“Opt-In Plaintiffs” and, together with Named Plaintiff, “Plaintiffs”), and Defendant Mission Point Management Services, LLC, by and through their undersigned counsel, and for their Joint Motion for Approval of Collective Action Settlement, they do hereby state and allege as follows:

1. Named Plaintiff filed suit against Defendant asserting individual and putative collective action claims for violation of the overtime provisions of the Fair Labor Standards Act (“FLSA”) and the Michigan Workforce Opportunity Wage Act (“WOWA”). The Complaint alleges that Defendant failed to pay Named Plaintiff and other similarly situated employees their minimum wage and overtime compensation on time, resulting in violations of both the FLSA and WOWA. Named Plaintiff further alleges that Defendant misclassified her as exempt from the overtime provisions of the FLSA and WOWA and retaliated against her for complaining to Defendant about the perceived issues. Defendant denies these allegations.

2. Following arms-length settlement discussions between counsel, the

Parties have reached a Settlement Agreement that resolves Plaintiffs' claims. The Parties seek this Court's approval of their agreement as memorialized in the fully executed Settlement Agreement attached hereto as Exhibit 1.

3. The Parties believe the Agreement is fair, reasonable, and adequate.

4. This Joint Motion is supported by a contemporaneously filed brief.

WHEREFORE, premises considered, the Parties respectfully request that the Court approve their Agreement, and for all other necessary and proper relief. Finally, the Parties jointly request that this action be dismissed with prejudice upon the Court's entry of an order approving the settlement.

Respectfully submitted,

**DESHANTA BREWSTER, Individually
and on Behalf of All Others
Similarly Situated, PLAINTIFFS**

SANFORD LAW FIRM, PLLC
Kirkpatrick Plaza
10800 Financial Centre Parkway, Suite 510
Little Rock, Arkansas 72211
Telephone: (800) 615-4946
Facsimile: (888) 787-2040

/s/ Josh Sanford
Josh Sanford
Ark. Bar No. 2001037
josh@sanfordlawfirm.com

Lead Counsel for Plaintiffs

BLANCHARD & WALKER, PLLC
221 North Main Street, Ste. 300
Ann Arbor, MI 48104
Telephone: (734) 929-4313
Facsimile: (888) 929-5833

/s/ David M. Blanchard
David M. Blanchard
State Bar No. P67190
blanchard@bwlawonline.com

Local Counsel for Plaintiffs

and **DEFENDANT MISSION POINT
MANAGEMENT SERVICES, LLC**

FISHER & PHILLIPS LLP
300 Park Street, Suite 370
Birmingham, MI 48009
Telephone: (248) 540-8019

Sarah G. Bennett
State Bar No. P85806
sbennett@fisherphillips.com

/s/ William E. Altman
William E. Altman
State Bar No. P52788
waltman@fisherphillips.com

CERTIFICATE OF SERVICE

I hereby certify that on this 27th day of February, 2024, I electronically filed the foregoing with the Clerk of Court by using the CM/ECF system, which will send a notice of electronic filing to all parties.

/s/ Josh Sanford
Counsel for Plaintiff